

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANDRE ROYAL,

Plaintiff,

-against-

NATIONAL FOOTBALL LEAGUE  
MANAGEMENT COUNCIL, NATIONAL  
FOOTBALL LEAGUE PLAYERS  
ASSOCIATION, RETIREMENT BOARD OF  
THE BERT BELL/PETE ROZELLE NFL  
PLAYER RETIREMENT PLAN,  
KATHERINE “KATIE” BLACKBURN,  
RICHARD “DICK” CASS, TED PHILLIPS,  
SAMUEL MCCULLUM, ROBERT SMITH  
AND JEFFREY VAN NOTE,

Defendants.

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No. 1:19-cv-05164-AJN

**NOTICE OF MOTION**  
**TO DISMISS AMENDED**  
**COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant National Football League Players Association, by and through its attorneys, Winston & Strawn LLP, hereby moves this Court, before the Honorable Alison J. Nathan, United States Courthouse for the Southern District of New York, 40 Foley Square, New York, NY 10007 for (1) an Order pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) dismissing Plaintiff Andre Royal’s Amended Complaint (ECF 15) in its entirety, (2) an Order striking Plaintiff’s jury demand, and (3) such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
October 3, 2019

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